

Proposed Amendments to the Walla Walla 2040 Comprehensive Plan Map, Official Zoning Map, and Zoning Code relating to Manufactured Homes and Manufactured Home Park Communities Level VI Review Staff Report

File# ZCA-22-0003; CPA-22-0003 and SEP-22-0018

I. **GENERAL INFORMATION:**

Application Date: November 2, 2022

Planning Commission

Public Hearing Date: December 5, 2022

Applicant: City of Walla Walla

15 N. 3rd Avenue, Walla Walla, WA 99362

Amendment Summary:

The Walla Walla City Council passed Ordinance 2022-09 on March 23, 2022, which placed a moratorium on the acceptance, processing, or approval of applications for development authorizations and other permits for the change of use of mobile/manufactured home parks. The ordinance also initiated and directed city staff to process amendments to the Walla Walla 2040 Comprehensive Plan and the Walla Walla Municipal Code related to mobile/manufactured home parks.

The proposed amendments include adding a "Manufactured Home Park Community" as a new land use type to the City of Walla Walla 2040 Comprehensive Plan Future Land Use Map. The proposed amendment also creates a new "Mobile/Manufactured Home Park Community" (MHC) zoning district to the City of Walla Walla Official Zoning Map. The proposed zoning code amendments add development regulations for the Mobile/Manufactured Home Park Community zoning district; adds a section on eviction notice standards for the change of use or closure of a manufactured home park; and adds a section requiring notice of sale of a Mobile/Manufactured Home Park and the opportunity for qualified tenant organizations to purchase the Mobile/Manufactured Home Park.

The proposed amendments also include revised language to provide clarity, simplicity, and removal of obsolete terms; provides revisions to allow for the permanent placement of new single section or single wide manufactured/ mobile homes in the Neighborhood Residential (RN) zone, as primary or accessory dwelling units with revisions to design and placement standards; and adds a section addressing standards for recreational vehicles as primary residences in manufactured home parks.

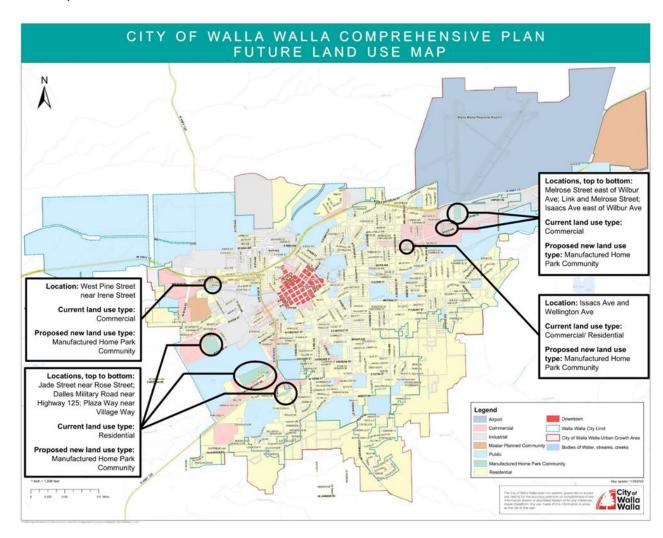
Brief History of Amendment:

As noted above, the proposed amendments were initiated by City Council via Ordinance 2022-09, which placed a moratorium on the development or change of use of mobile/ manufactured home parks.

Since December 2021, the City Council Ad Hoc Committee on Housing has been researching, learning, and discussing various policy options regarding manufactured homes and manufactured home communities. At the May 9, 2022, City Council Work Session, the Ad Hoc Committee on Housing presented policy recommendations and code changes to City Council for discussion.

II. <u>DESCRIPTION OF PROPOSED WALLA WALLA 2040 COMPREHENSIVE PLAN</u> FUTURE LAND USE MAP AMENDMENTS

The proposed Comprehensive Plan Future Land Use Map amendment is shown on the map below, adding Manufactured Home Park Community (MHC) as a new land use type. This new land use type would apply to all existing Manufactured Home Parks within the city limits of Walla Walla, as further described below. The proposed comprehensive plan future land use map is also included as an attachment to this staff report.



The proposed Walla Walla 2040 Comprehensive Plan Future Land Use Map amendments are further described as follows:

General Location: Dalles Military Road near Highway 125

Current land use type: Residential

Proposed new land use type: Manufactured Home Park Community

General Location: Plaza Way near Village Way

Current land use type: Residential

Proposed new land use type: Manufactured Home Park Community

General Location: Jade Street near Rose Street

Current land use type: Residential

Proposed new land use type: Manufactured Home Park Community

General Location: West Pine Street near Irene Street

Current land use type: Commercial

Proposed new land use type: Manufactured Home Park Community

General Location: Melrose Street east of Wilbur Avenue

Current land use type: Commercial

Proposed new land use type: Manufactured Home Park Community

General Location: Link Street and Melrose Street

Current land use type: Commercial

Proposed new land use type: Manufactured Home Park Community

General Location: Isaacs Avenue east of Wilbur Avenue

Current land use type: Commercial

Proposed new land use type: Manufactured Home Park Community

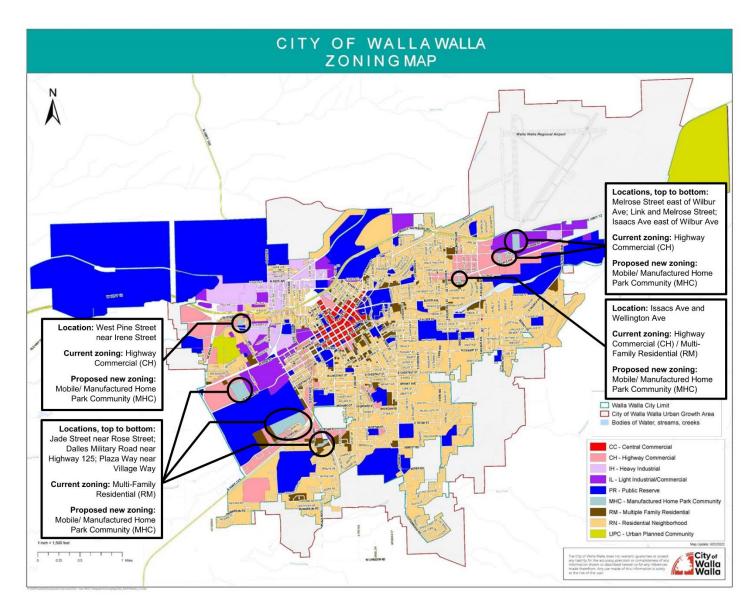
General Location: Isaacs Avenue and Wellington Avenue

Current land use type: Commercial/ Residential

Proposed new land use type: Manufactured Home Park Community

III. DESCRIPTION OF PROPOSED OFFICIAL ZONING MAP AMENDMENTS

The proposed Official Zoning Map amendments are shown on the map below, adding Manufactured Home Park Community (MHC) as a new zoning district. The new zoning district is shown below in light blue. This new zoning district would apply to all existing Manufactured Home Parks within the city limits of Walla Walla, as further described below. The proposed zoning map is also included as an attachment to this staff report.



The proposed Official Zoning Map amendments are further described as follows:

General Location: Dalles Military Road near Highway 125

Current zoning map district: Multi-Family Residential (RM)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: Plaza Way near Village Way

Current zoning map district: Multi-Family Residential (RM)

Proposed new land use type: Manufactured Home Park Community (MHC)

General Location: Jade Street near Rose Street

Current zoning map district: Multi-Family Residential (RM)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: West Pine Street near Irene Street

Current zoning map district: Highway Commercial (CH)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: Melrose Street east of Wilbur Avenue

Current zoning map district: Highway Commercial (CH)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: Link Street and Melrose Street

Current zoning map district: Highway Commercial (CH)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: Isaacs Avenue east of Wilbur Avenue

Current zoning map district: Highway Commercial (CH)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

General Location: Isaacs Avenue and Wellington Avenue

Current zoning map district: Highway Commercial (CH) / Multi-Family

Residential (RM)

Proposed new zoning map district: Manufactured Home Park Community (MHC)

IV. DESCRIPTION OF PROPOSED ZONING CODE TEXT AMENDMENTS

The proposed Zoning Code Text Amendments would amend and revise the following provisions of the Walla Walla Municipal Code (WWMC):

WWMC 15.20 Mobile/ Manufactured Home Placement Permit: Amendments to permitting requirements for the moving and placement of manufactured homes. These amendments are largely clean up changes to remove obsolete terms and to otherwise provide clarity and simplification.

WWMC 20.06.030 Construction and Definitions: Amendments and revisions to definitions of manufactured homes and other related terms. These definitions are proposed to be moved to WWMC 20.06.030 from WWMC 20.180.030, so that all definitions are in one location.

WWMC 20.50.035 MHC Mobile/ Manufactured Home Park Community (New Section): Addition of a new Mobile/ Manufactured Home Park Community zoning district, including the description and purpose of the zone, level of permitted uses and owners' use exception relating to the MHC zoning.

WWMC 20.100 Tables of Permitted Land Uses: Adds the new Mobile/ Manufactured Home Park Community (MHC) zoning to the table with the level of review of land uses permitted in the new MHC zoning district. While manufactured home parks, mobile homes, and manufactured homes are the primary proposed Level I permitted uses in the new MHC zone, other proposed allowed uses include other residential uses, public parks and playgrounds, religious facilities, and others.

Note: Staff has attempted, in its best judgement, to identify permitted uses within the proposed new Manufactured Home Park Community (MHC) zone. However, staff encourages the Planning Commission to carefully review and consider what are appropriate permitted uses in the new MHC zone as part of its review and recommendation to the City Council.

For clarification, the zoning code preserves the ability for new manufactured home parks to be sited in the Multi-Family Residential or Highway Commercial zones or conditionally sited in the Neighborhood Residential zone.

WWMC 20.180 Mobile/ Manufactured Homes – General: Revisions to allow for the permanent placement of single-section or single wide manufactured homes in Neighborhood Residential zones as primary residences or accessory dwelling units. Proposed amendments also include deleting the definitions and moving them to WWMC 20.06, so that they are all in one place; and revisions to design and placement standards for manufactured homes.

WWMC 20.184 Manufactured Home Parks: Revisions include a new section addressing standards for recreational vehicles used as primary residences in manufactured home parks; and revisions regarding spaces within manufactured home parks and parking standards. Amendments also include a new section addressing eviction notices due to a closure or change of use of a manufactured home park, including a tenant relocation plan; and a new section regarding notice standards for the sale of manufactured home parks, including the opportunity for qualified tenant organizations to purchase the manufactured home park.

WWMC 20.192 Temporary Placement of Manufactured Homes for Care of Infirm or Elderly: This chapter is proposed to be removed due to becoming obsolete with the addition of other proposed amendments.

WWMC 20.204 Signs allowed in the MHC zone: Adds a new section addressing signs in the new Mobile/ Manufactured Home Community zone and proposing sign permit application review by the Site Plan Review Committee (SPRC).

IV. <u>SEPA STATUS:</u>

The City of Walla Walla Development Services has determined that this non-project, legislative proposal is unlikely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). Staff has reviewed the following: Submitted SEPA Checklist, dated October 31, 2022, and existing environmental documents: Walla Walla Comprehensive Plan Final Environmental Impact Statement (FEIS), issued May

22, 2018, and Walla Walla Comprehensive Plan - Walla Walla 2040, Ordinance 2018-15, adopted June 13, 2018.

A SEPA Determination of Non-Significance (DNS) and Washington State Environmental Policy Act (SEPA) checklist was uploaded to the Washington State Department of Ecology SEPA register on November 10, 2022. It was also posted to the City of Walla Walla Public Notices website and emailed to a SEPA contact list of applicable agencies with jurisdiction. The DNS also published in the Union Bulletin on November 10, 2022 with a comment period that ended on November 28, 2022.

V. FINDINGS OF FACT:

- A Comprehensive Plan amendment is a Level VI review under Walla Walla Municipal Code (WWMC) Chapter 20.30, which requires the Planning Commission to hold a public hearing and make a recommendation to the City Council. The City Council also holds a public hearing and is the approving authority.
 - A. WWMC Section 20.48.100(D), Comprehensive Plan/Subarea Plan adoption/amendment criteria is as follows: The City's action on a Comprehensive Plan adoption or amendment proposal shall be based on legislative findings upon whether or not the proposal conforms with Chapter 36.70A Revised Code of Washington (RCW).
- 2. Zoning code text amendments are a Level V review under Walla Walla Municipal Code (WWMC) Chapter 20.28, which requires the Planning Commission to hold a public hearing and make a recommendation to the City Council. The City Council is the approving authority.
- 3. In March 2021, the Affordable Housing Implementation Task Force Local Policies and Regulations Subcommittee of the local organization, Community Council, recommended comprehensive plan amendments, through the city's docketing process, relating to affordable housing and specifically manufactured housing. These amendments, File Number CPA-21-0004, were approved by City Council via Ordinance 2021-26 on September 8, 2021.
- 4. In August 2021, the Walla Walla Regional Housing Action Plan was adopted by City Council via Ordinance 2021-23, which included policy and code change recommendations relating to increased opportunities for the siting of manufactured homes, the preservation of existing manufactured home parks, and strategies for mitigating the displacement of vulnerable residents.
- 5. On March 23, 2022, City Council passed Ordinance 2022-09, which placed a moratorium on the acceptance, processing, or approval of applications for development authorizations and other permits for change of use of mobile/manufactured home parks. The ordinance also initiated and directed city staff to process amendments to the Walla Walla Municipal Code and Walla Walla 2040 Comprehensive Plan related to mobile/manufactured home parks.
- 6. At the May 9, 2022, City Council Work Session, the City Council Ad Hoc Committee on Housing presented policy and code change recommendations

on manufactured home and manufactured home park communities to City Council for discussion.

- 7. The formal comprehensive plan map, official zoning map, and zoning code text amendments were initiated on November 3, 2022. A Notice of Application/ Notice of Public Hearing for the amendments was posted on the City of Walla Walla public notices website on November 8, 2022, and was published in the Union Bulletin on November 8, 2022, as required by WWMC 20.14.065.
- 8. The Notice of Application/ Notice of Public Hearing was mailed to all current residents and landowners of all manufactured/ mobile home parks in the City of Walla Walla on November 8, 2022, which totaled approximately 600 mailings. The Notice of Application/ Notice of Public Hearing was also emailed to those who had previously commented on the topic of manufactured/ mobile home parks.
- 9. The notice of application comment period ended on November 28, 2022.
- 10. Attached to this staff report are the comments received during the public comment period. A summary of the nature of the public comments is also provided below. The following public comments were received:

Dorothy Knudson, dated November 8, 2022

Jo Records, dated November 9, 2022

Kirk Tucker, dated November 18, 2022

Confederated Tribes and Bands of the Yakama Nation, dated November 15, 2022

Catherine Veninga, dated November 22, 2022

Laurie Sarrazin, dated November 27, 2022

Chester Baldwin c/o Manufactured Housing Communities of

Washington, dated November 28, 2022

Summary: A total of seven written comments were received, with four of the seven commentors being manufactured home park residents. The first commentor expressed gratitude for the notification, the second was supportive of the proposed changes, the third requested the information about the proposed changes in a different format, and the last commentor expressed support for protecting manufactured home parks.

Of the three other commentors, two were from organizations and the other was a private citizen. The private citizen was supportive of the proposed amendments with one suggestion to add "eligible organizations" to the opportunity to purchase section (20.184.120.B), in the event that a manufactured home park is offered for sale. The first organization commentor was simply providing information on initiating consultation within their organization. The second organization commentor expressed concerns that the proposed amendments would limit manufactured home park landowners from

selling their properties, due to the proposed notice of sale and opportunity to purchase provisions. The commentor also expressed concerns about the proposed requirements for relocation plans, in the event of a change of use or sale of a manufactured home park. In addition to the concerns expressed, the commentor also applauded the City's efforts to expand manufactured home placement throughout the City.

Based on the above public comments received, Staff made a few adjustments to the proposed zoning code text amendments, which are included in the Proposed Zoning Code Text Amendments document attached to this staff report. The adjustments are further described as follows:

The first proposed adjustment adds a definition for "eligible organization" in WWMC 20.06.030.E Definitions.

The second proposed adjustment adds a definition for "residential nonprofit cooperative" in WWMC 20.06.030. R Definitions.

The third proposed adjustment adds an exception to the notice of opportunity to purchase requirements. In WWMC 20.184.120.C.8, a notice of opportunity to purchase would not be required when a manufactured home park ownership is transferred through a bonafide testamentary disposition to an heir, issue, or devisee.

- 11. A State Environmental Policy Act (SEPA) Determination of Non-Significance (DNS) was issued on November 7, 2022. The DNS was posted on the City Walla Walla public notices website on November 10, 2022, and was published in the Union Bulletin on November 10, 2022, as required by WWMC 20.14. The SEPA DNS comment period ended on November 28, 2022.
- 12. Pursuant to RCW 36.70A.106, the proposed comprehensive plan map, official zoning map, and zoning code text amendments were sent to the Washington State Department of Commerce as required for the 60-day review on November 8, 2022. The acknowledgement letter was received from the Department of Commerce on November 8, 2022 and is attached to this staff report.
- 13. The City Council initiated these proposed comprehensive plan map, official zoning map, and zoning code text amendments based on the request of the people and Ordinance No. 2022-09 to review the current language of the code, as allowed by WWMC Chapter 20.48, Amendments. The following outlines the relevant requirements and criteria for reviewing and processing amendments:

20.48.020 Who may initiate.

- A. Amendments may be initiated by:
- 1. The City Council;
- 2. The City Manager;
- 3. The Planning Commission;
- 4. The Zoning Administrator;
- 5. Any person requesting amendment to the text of this Code;

- 6. Any property owner or contract purchaser or authorized agent requesting a rezone of his or her property; or
- 7. Any property owner(s) requesting annexation to the City.

20.48.030 Procedure.

C. The City Council is responsible for the approval or denial of a rezone or text amendment. When considering a rezone request or a text amendment, the City Council will act on the request at a public meeting upon the hearing record of the initial reviewing body.

20.48.045 Review criteria prezones, area wide rezones and text amendments.

The decision on a prezone, area wide rezone, or text amendment shall be based on a legislative finding upon whether or not the proposal is consistent with and implements the Walla Walla Comprehensive Plan.

20.48.100 Comprehensive plan/ subarea plan adoption and amendments.

A. Comprehensive plan and subarea plan provisions and designations regarding the city, and amendments thereto, shall be processed in accordance with RCW 35A.63.070, 35A.63.071, 35A.63.072, 35A.63.073, and Chapter 36.70A RCW. Public notice and participation shall be provided in accordance with the notice and hearing requirements of this title. The planning commission shall, following public hearing, forward its recommendation to the city council for consideration and decision. The Walla Walla city council shall conduct a public hearing upon a plan or amendment proposal prior to taking action thereon. City council adoption shall constitute final action upon the provisions and designations which regard the city. The city council may, in its discretion, accept additional public comment at any time before final action is taken; however, an additional opportunity for review and comment upon a plan or amendment proposal is not required after the public hearing is closed unless the city council chooses to consider a change to the draft which was available for public review and comment after the opportunity for review and comment on the draft has passed and none of the exceptions below apply. An additional opportunity for public review and comment upon such a change is not required if:

- 1. An environmental impact statement has been prepared for the proposal and the change is within the range of alternatives considered in the impact statement;
- 2. The change is within the scope of alternatives available for public comment:
- 3. The change only corrects typographical errors, corrects crossreferences, makes address or name changes, or clarifies language of the proposal without changing its effect;
- 4. The change relates to a capital budget decision; or
- 5. The change is to a moratorium or interim control.
- D. The city's action on a comprehensive plan adoption or amendment proposal shall be based on legislative findings upon whether or not the proposal conforms with Chapter 36.70A RCW.

- 14. The proposed comprehensive plan map, official zoning map, and zoning code text amendments are supported by the City of Walla Walla Comprehensive Plan as identified in the conclusions of law section of this staff report as required by RCW 36.70A.130(1)(d), which reads in part: "Any amendment of or revision to development regulations shall be consistent with and implement the comprehensive plan."
- 15. The Planning Commission is scheduled to conduct a Public Hearing on December 5, 2022.

VI. CONCLUSIONS OF LAW:

1. The City of Walla Walla Development Services department followed the process outlined in Walla Walla Municipal Code Chapter 20.48 Amendments. The city's action on a Comprehensive Plan adoption or amendment proposal shall be based on legislative findings upon whether or not the proposal conforms with Chapter 36.70A of the Revised Code of Washington (RCW). The following applies:

20.48.020 Who may initiate.

- A. Amendments may be initiated by:
- 1. The City Council;
- 2. The City Manager;
- 3. The Planning Commission;
- 4. The Zoning Administrator;
- 5. Any person requesting amendment to the text of this Code:
- 6. Any property owner or contract purchaser or authorized agent requesting a rezone of his or her property; or
- 7. Any property owner(s) requesting annexation to the City.

20.48.030 Procedure.

C. The City Council is responsible for the approval or denial of a rezone or text amendment. When considering a rezone request or a text amendment, the City Council will act on the request at a public meeting upon the hearing record of the initial reviewing body.

20.48.045 Review criteria prezones, area wide rezones and text

The decision on a prezone, area wide rezone, or text amendment shall be based on a legislative finding upon whether or not the proposal is consistent with and implements the Walla Walla Comprehensive Plan.

1. Procedural Elements-

The proposed comprehensive plan map, official zoning map, and zoning code text amendments were initiated by the City Council via Ordinance No. 2022-09, passed on March 23, 2022.

A public hearing notice for the Planning Commission Public Hearing scheduled for December 5, 2022 was published in the Union Bulletin on November 8, 2022 and posted on the City's website on November 8, 2022.

The Planning Commission shall conduct a Public Hearing and make a recommendation to the City Council, who shall also conduct a public hearing for the comprehensive land use map amendments.

The review criterion for a zoning code text amendment is that the amendments are consistent with and implement the Walla Walla Comprehensive Plan – Walla Walla 2040. The review criteria for a comprehensive plan amendment shall be based on legislative findings upon whether or not the proposal conforms with Chapter 36.70A RCW. In the following section, Staff will discuss how the proposed zoning code text amendments are consistent with and are supported by the Comprehensive Plan.

Staff finds that the proposed amendments meet the procedural requirements of WWMC 20.48 - Amendments based on the above staff analysis.

2. Comprehensive Plan -

The proposed amendments are supported by the Walla Walla Comprehensive Plan – Walla Walla 2040 Goals and Policies, as follows:

Land Use Policy 1.5: Establish future land use and zoning designations that minimize and mitigate potential land use conflicts.

The proposed Comprehensive Plan Future Land Use Map amendment creates a new land use type, Manufactured Home Park Community, and the zoning map amendment creates a new zoning district, Mobile/Manufactured Home Park Community (MHC). Manufactured home park communities are currently vulnerable to redevelopment pressures due to the lack of protections in current zoning code standards and rising land values. By creating these new proposed land use type and zoning designations specifically for manufactured home park communities, the intention is to protect these communities and minimize potential land use conflicts between manufactured home park communities and other residential or commercial land uses.

Land Use Goal 3: There are a variety of uses allowed throughout Walla Walla that encourage options for housing and business.

Land Use Policy 3.7: Support a variety of housing types such as tiny homes, duplexes, multi-family development, cottage housing, single family residential, and manufactured homes and manufactured housing communities.

This proposed amendment seeks to preserve existing housing within existing manufactured home park communities, as well as support increased opportunities and flexibility for the siting of manufactured homes, specifically single-section or single-wide manufactured homes, thereby expanding the variety of housing types available throughout the city. Single-section or single-wide manufactured homes offer a smaller footprint and are typically more affordable than a double section manufactured home.

Housing Goal 1: A broad range of housing choices is available to meet the needs of people of diverse socio-economic status, household type, and age.

Housing Policy 1.1: Provide an array of housing choices such as apartments, small lot single family housing, accessory dwelling units, townhomes, manufactured homes, and cottages to meet the needs of people of all incomes throughout their lifespan.

Manufactured housing provides an affordable housing option for residents within the City of Walla Walla, particularly for senior residents and those on fixed incomes. For example, the largest manufactured home park in the City of Walla Walla has a provision for residents to be 55 years and older.

The proposed amendments would also expand the allowable locations in the City for siting single-section or single-wide manufactured homes as primary homes or accessory dwelling units, in turn increasing the range of affordable housing choices and opportunities for a diversity of residents with differing socio-economic status, household type, and age.

Housing Policy 1.3: Encourage the use of existing housing stock, including manufactured homes and manufactured housing communities, to provide affordable housing for households with middle- and lower-incomes.

The addition of "including manufactured homes and manufactured housing communities" to the above Housing Policy 1.3 was added during the comprehensive plan amendment by Section 7 of Ordinance 2021-26 that was recommended by the Affordable Housing Implementation Task Force Local Policies and Regulations Subcommittee of Community Council, through the city's docketing process. This addition recognizes that manufactured housing is a critical form of affordable housing in Walla Walla and bolsters the inclusion of manufactured housing in the Comprehensive Plan.

A key aspect of the proposed amendments is the creation of the new Manufactured Home Park Community land use type and the new Mobile/Manufactured Home Park Community (MHC) zone. The MHC zone's purpose is to provide and protect affordable opportunities for the long-

term occupancy of manufactured housing and mobile homes for residential purposes in mobile/ manufactured home parks.

Housing Policy 1.7: Allow manufactured housing and accessory dwelling units in single family residential areas.

Housing Policy 1.9: Support the establishment of housing land trusts and other innovative housing solutions and explore policies to reduce development costs for housing developments that serve low to moderate income households.

The proposed zoning code amendments include revisions to allow for the permanent placement of single-section or single-wide manufactured homes in the Neighborhood Residential zone as both primary dwellings and as accessory dwelling units. The zoning code previously required manufactured homes in the Neighborhood Residential zone to be at least double section or double-wide units, restricted the placement of single section or single wide manufactured homes, and prohibited the permanent placement of manufactured homes from being used as accessory dwelling units. These proposed amendments provide for innovative housing solutions and aid in reducing housing costs by decreasing the barriers to siting and building more affordable housing types, including single-section or single-wide manufactured homes.

3. Washington State Growth Management Act (GMA) –
The Growth Management Act (GMA) RCW 36.70A.020 goals that apply to the proposed amendments are the following:

Goal 4 Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

These amendments pertain specifically to manufactured housing and manufactured home park communities and seek to increase opportunities for siting manufactured homes in residential zones, as well as encouraging the preservation of existing housing stock within existing manufactured home park communities.

Goal 7 Permits. Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.

Goal 11 Citizen Participation and Coordination. Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

On November 8, 2022, the notice of application and notice of public hearing was mailed to all current residents and landowners of all existing manufactured home parks, within the city limits of Walla Walla, which totaled approximately 600 mailings. The notice was also emailed to those who had previously commented on the topic of manufactured housing, which totaled approximately 20 email addresses.

The public hearing notice was posted on November 8, 2022, and published on November 8, 2022, advertising the Planning Commission's public hearing scheduled on December 5, 2022 and soliciting comments from the public.

The intent is to allow the Planning Commission to review the public input and feedback and make a recommendation on the proposed amendments through this legislative process. Staff concludes that the proposed zoning code text amendments will implement the goals and policies of the City of Walla Walla Comprehensive Plan 2040 and of the Washington State Growth Management Act (GMA).

4. Chapter 36.70A of the Revised Code of Washington (RCW) -The proposed amendments comply with the following requirements and applicable sections of Chapter 36.70A of the RCW:

RCW 36.70A.130(1)(a): Each comprehensive land use plan and development regulations shall be subject to continuing review and evaluation by the county or city that adopted them. Except as otherwise provided, a county or city shall take legislative action to review and, if needed, revise its comprehensive land use plan and development regulations to ensure the plan and regulations comply with the requirements of this chapter according to the deadlines in subsections (4) and (5) of this section.

The City of Walla Walla proposes to amend its comprehensive plan future land use map, official zoning map and zoning code as permitted by RCW 36.70A.130(1)(a).

VII. STAFF RECOMMENDATION

Staff directs the Planning Commission to conduct a public hearing and consider all public testimony, evidence, and exhibits presented to it. Staff recommends that the Planning Commission recommend approval to the Walla Walla City Council for the Proposed Amendments to the Comprehensive Plan Future Land Use Map, Official Zoning Map, and Zoning Code relating to Manufactured Homes and Manufactured Home Park Communities.

Prepared by Lisa Wasson-Seilo, Planner:	Prepared by Lisa Wasson-Seilo, Planner:	Lisa Wasson Seilo
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VIII. EXHIBITS

- 1. Application Materials
 - a. Zoning Code Amendment Application Dated October 31, 2022
 - b. Comprehensive Plan Amendment Application Dated October 31, 2022
 - c. SEPA Checklist

Dated October 31, 2022

- 2. Proposed Comprehensive Plan Map Amendments
- 3. Proposed Official Zoning Map Amendments
- 4. Proposed Zoning Code Text Amendments

- 5. Notice of Application & Notice of Public Hearing Dated November 3, 2022
- 6. SEPA Determination of Non-Significance (DNS)
 7. WA Department of Commerce Notification
 Dated November 7, 2022
 Dated November 8, 2022
- 8. WA Department of Commerce Acknowledgement Letter Dated November 8, 2022
- 9. Public Notice Certificate
- 10. Public Notification Materials
 - a. Mailing List
 - b. Special Notice Request List
- 11. Comment Letters